

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

|                                 |   |   |
|---------------------------------|---|---|
| KIMETRA BRICE, EARL BROWNE, and | § |   |
| JILL NOVOROT,                   | § |   |
| <i>Plaintiffs,</i>              | § | Misc. No. 3:21-mc-00023                 |
|                                 | § |   |
| v.                              | § | (Relates to Case No. 3:18-cv-1200-      |
|                                 | § | WHO, in the United States District      |
| HAYNES INVESTMENTS, LLC, and    | § | Court, Northern District of California) |
| L. STEVEN HAYNES,               | § |   |
| <i>Defendants.</i>              | § |   |

**HAYNES INVESTMENTS, LLC, AND L. STEVEN HAYNES'S**  
**MOTION FOR PROTECTION**

Defendants, Haynes Investments, LLC ("Haynes Investments"), and L. Steven Haynes ("Haynes" and together, "Defendants"), seek an order of protection from giving testimony regarding the confidential terms of a Texas state court settlement agreement, which testimony was sought by Plaintiffs, Kimetra Brice, Earl Browne, and Jill Novorot (collectively "Plaintiffs"), during a deposition taken in the matter known as Case No. 3:18-cv-1200-WHO, *Kimetra Brice et al. v. Haynes Investments, LLC, et al.*, pending in the United States District Court for the Northern District of California (the "California Lawsuit"). The reasons why this motion for protection should be granted are detailed in the accompanying Brief in Support of the Motion.

Dated: March 4, 2021.

Respectfully submitted,

By: /s/ David A. Walton

David A. Walton

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*Haynes Investments and L. Steven Haynes*

**CERTIFICATE OF CONFERENCE**

The parties have conferred on the relief requested in this motion for protection and have been unable to reach an amicable resolution. (Email between Defendants' Counsel and Plaintiffs' Counsel, attached as **Exhibit 8**.)

By: /s/ David A. Walton

David A. Walton

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was sent to the following parties of record in accordance with the Federal Rules of Civil Procedure on March 4, 2021.

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